

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Stamford Group, Inc. (the "Stamford") hereby stipulate to the dismissal, with prejudice to refile, of the Receiver's third-party claims in this action against the Stamford and to the dismissal, with prejudice to refile, of the Stamford' counterclaims against the Receiver. Each party shall bear their own costs and fees with respect to this action.

This Stipulation is not intended, nor shall it be construed, as a stipulation for the dismissal of any other pending claims brought by either the Receiver or Stamford in the instant action.

Dated: July 25, 2011

By: s/Melvin R. McVay  
Melvin R. McVay, OK Bar No. 06096  
Shannon K. Emmons, OK Bar No. 14272  
Corporate Tower/Thirteenth Floor  
101 North Robinson  
Oklahoma City, Oklahoma 73102  
(405) 235-4100  
Mrmcvay@phillipsmurrah.com  
Skemmons@phillipsmurrah.com

***Attorneys for Defendant H. Thomas  
Moran, II, Court-appointed Receiver of  
Lydia Capital, LLC***

By: s/ Joseph N. Campolo  
Joseph N. Campolo  
Campolo, Middleton & Associates, L.L.P.  
3340 Veterans Highway, Suite 400  
Bohemia, NY 11716  
Facsimile: (631) 738-0659

***Attorneys for Stamford Institutional Fund  
2005A, LLC,  
Stamford Portfolio Management, LLC,  
The Stamford Group, Inc.***

00565161.DOC

I hereby certify that on this 25<sup>th</sup> day of July, 2011, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

William S. Gyves wgyves@entwistle-law.com  
***Attorney for H. Thomas Moran, II,***  
***Court-Appointed Receiver of Lydia Capital, LLC***

Thuy Trang Bui thuy.bui@dbr.com  
***Attorney for Plaintiff,***  
***The Lincoln National Life Insurance Company***

Justin C. Frankel jcf@frankelnewfield.com  
***Attorney for Helen Gisonni***  
***Attorney for Eve-Lynn Gisonni***

Ira S. Lipsius iral@sfl-legal.com  
***Attorney for Zalman Silber***  
***Attorney for Frederick Schulman***

Nolan Edward Shanahan nshanahan@coleschotz.com  
Karl E. Robinson krobinson@winthrop.com  
***Attorneys for SBH Programs, LLC***  
***Attorneys for SBH Financial***

Joseph N. Campolo jcampolo@cmnallp.com  
***Attorney for Stamford Institutional Fund 2005A, LLC***  
***Attorney for Stamford Portfolio Management, LLC***  
***Attorney for The Stamford Group, Inc.***

Thomas M. Smith tsmith@kknylaw.com  
***Attorney for International Partners For Life Corporation***

s/ Shannon K. Emmons

I also hereby certify that on this 25<sup>th</sup> day of July, 2011, I served the foregoing via electronic transmission to the following:

Jason P. Gosselin, Esq.  
Drinker Biddle & Reath LLP  
One Logan Square  
18th & Cherry Streets  
Philadelphia, PA 19103  
Jason.gosselin@dbr.com

*Attorney for Plaintiff*  
*The Lincoln National Life Insurance Company*

s/ Shannon K. Emmons